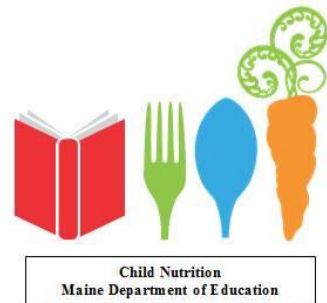


# Preparing for Your Upcoming Administrative Review

Stephanie Stambach MS, RD, SNS  
Maine School Nutrition Association Conference  
August 10, 2016

# Objectives

- Provide an understanding of the Administrative Review process
- Identify common errors discovered during the Administrative Review process



# The Big Picture

Off-Site Assessment Tool & Documentation



On-site Review

-

Validate SFA Responses



# Review Frequency & Schedule

## Frequency

- SFA must be reviewed every 3 years

## Review Period (Review Month)

- Most recent month claim submitted

## Week of Review

- Menu review during the Review Period

## Day of Review

- On-site Review

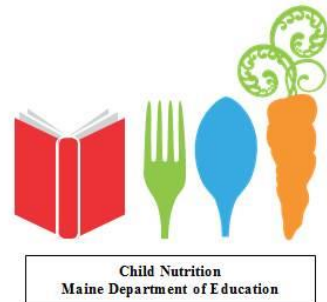


# Review Areas

Meal Access & Reimbursement	Meal Pattern & Nutritional Quality	Resource Management	General Program Compliance	Other Federal Program Reviews
<ul style="list-style-type: none"> <li>• Certification &amp; Benefit Issuance</li> <li>• Verification</li> <li>• Meal Counting &amp; Claiming</li> </ul>	<ul style="list-style-type: none"> <li>• Meal Components &amp; Quantities</li> <li>• Offer versus Serve</li> <li>• Dietary Specs &amp; Nutrient Analysis</li> </ul>	<ul style="list-style-type: none"> <li>• Risk Assessment</li> <li>• Nonprofit School Food Service Account</li> <li>• Paid Lunch Equity</li> <li>• Revenue from Non-program Foods</li> <li>• Indirect Costs</li> <li>• USDA Foods</li> </ul>	<ul style="list-style-type: none"> <li>• Civil Rights</li> <li>• SFA On-site Monitoring</li> <li>• Local Wellness Policy</li> <li>• Competitive Foods</li> <li>• Water</li> <li>• Food Safety</li> <li>• SBP &amp; SFSP Outreach</li> </ul>	<ul style="list-style-type: none"> <li>• Afterschool Snacks</li> <li>• Seamless Summer Option</li> <li>• Fresh Fruit &amp; Vegetable Program</li> <li>• Special Milk Program</li> </ul>

# Pre-Visit Procedures

- Superintendent notified
- Off-site Assessment Tools & Pre-visit Information
- State Agency reviews documentation
- Select sites for on-site review



# Sample Schedule For Multi-School Review

## Day One

- Arrive at Director's office and review applications, verification & paperwork
- Prior to lunch service, arrive at the kitchen to observe documents, production, and meal service
- Verify accountability
- Continue review of paperwork

## Day Two

- Arrive at second school and observe breakfast
- Review financials and finish paperwork
- Review FFVP if applicable
- Observe lunch at second school
- Exit interview



# PS1: Meal Access & Reimbursement

Certification & Benefit Issuance

Verification

Meal Counting & Claiming

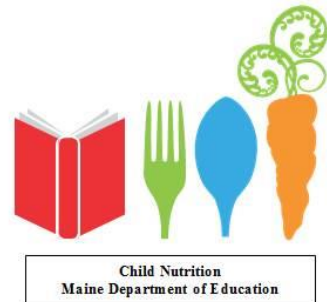
*Verifying that meals claimed for reimbursement were served only to eligible students.*





# PS1: Meal Access & Reimbursement

## Certification & Benefit Issuance



# PS1: Meal Access & Reimbursement

## Off-site



## On-site

- SFA answers questions in Off-site Assessment
- SFA sends electronic benefit issuance file
- SFA send additional documentation

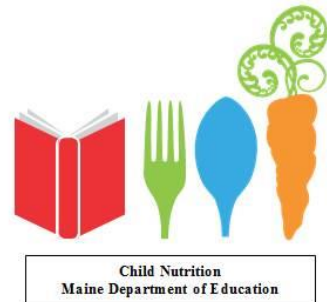
- Review student eligibility documents
- Review denied applications



# Benefit Issuance Documentation

Electronic list (Excel) of all free and reduced priced students

- All students in the district
- Do not include withdrawn or paid students
- List to be pulled from the Point of Service (POS)
- List should be pulled during the Review Period/Review Month



# Off-site Benefit Issuance Documentation

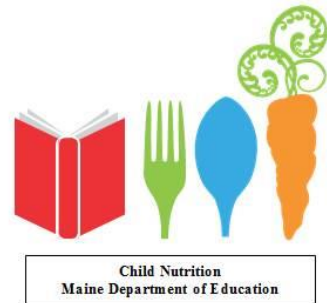
## Sample Benefit Issuance List

Student Name	Benefit Status	Method of Certification	School Name	Approval Date
Walter Beesley	F	DC	Smith ES	9/2/2015
David Hartley	R	Income Application	Harrison MS	8/30/2015
Sarah Platt	F	SNAP Application	Jones HS	9/10/2015
Gail Lombardi	F	Foster	Jones HS	9/2/2015



# On-site Benefit Issuance Documentation

- Approved meal benefit applications
- Denied meal benefit applications
- Direct certification lists
- Homeless list



# Common Review Findings

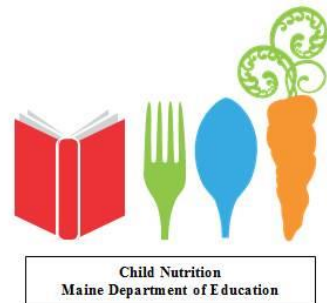
- ✓ Incomplete Applications
- ✓ Miscategorized Applications
- ✓ Incorrect SNAP/TANF number
- ✓ Missing documentation (Keep ALL DC lists)
- ✓ Not converting to annual income when different frequencies of income are reported

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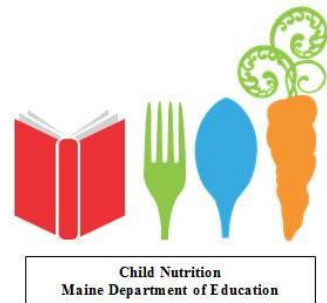
# PS1: Meal Access & Reimbursement

## Verification



# Verification

- Was it completed on time?
- Used correct method (error prone)
- Compare verification report to documentation
- Follow-ups were made (use tracking form)
- Notification letter met standards
- Eligibility status changes





# Verification

**Internal Use Only**

## HOUSEHOLD FILE CONTROL FORM

Head of Household Name: \_\_\_\_\_

Date Selected: \_\_\_\_\_ Notification Sent: \_\_\_\_\_

Response Due: \_\_\_\_\_ Second Notice Sent: \_\_\_\_\_

Response Due: \_\_\_\_\_ Missing Information: \_\_\_\_\_

DOCUMENT ALL TELEPHONE CONTACTS ON REVERSE SIDE OF THIS PAGE.

Date Reduction/Termination Notice Sent: \_\_\_\_\_

Food Stamp/TANF Household      Income Household: \$ \_\_\_\_\_ Monthly

Confirmed By -      Confirmed by -

☐ Predetermined Eligibility List      ☐ Wage stubs

☐ Food Stamp/TANF Office      ☐ Written documents (Explain below)

☐ ATP Card      ☐ Collateral Contacts (Explain below)

☐ Other: \_\_\_\_\_      ☐ Agency Records

☐ Eligibility not confirmed      ☐ Other: \_\_\_\_\_

Explanation: \_\_\_\_\_

Verification Result:

☐ No Change    ☐ Reduced to Free    ☐ Free to Reduced    ☐ Ineligible

Reason For Change:    ☐ High Income    ☐ Refused to Cooperate  
                                 ☐ Food Stamp/TANF Eligibility Not Confirmed  
                                 ☐ Other - include self denial

Signature of Verifying Official: \_\_\_\_\_

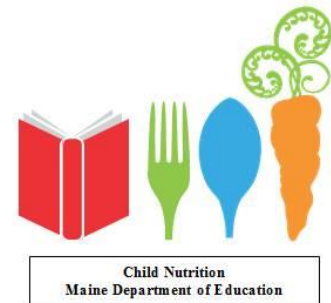
Date: \_\_\_\_\_

***Verification Notification and Tracking Forms***  
[www.maine.gov/doe/nutrition/forms/index.html](http://www.maine.gov/doe/nutrition/forms/index.html)



# Common Verification Errors

- ✓ Use the correct method
  - Error prone
  - Mark the Error prone applications when approving
- ✓ Double check your math
  - A family application who is on direct cert is NOT included in the number of applications
- ✓ Follow protocol/timeline
- ✓ Eligibility changes



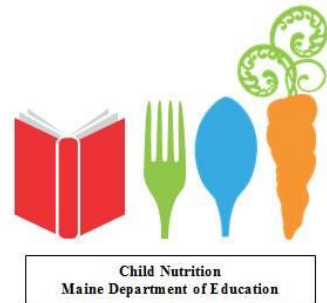
# PS1: Meal Access & Reimbursement

## Meal Counting & Claiming



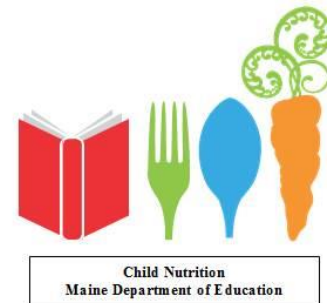
# On-Site Documents Needed

- Meal counts by day for the Review Period
  - Breakfast & Lunch
  - All schools in the District
- Edit Checks



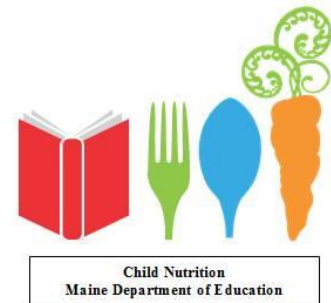
# Meal Counting and Claiming

- Provide an Accurate Count at POS
- Eligibility Category
- Without Overt Identification



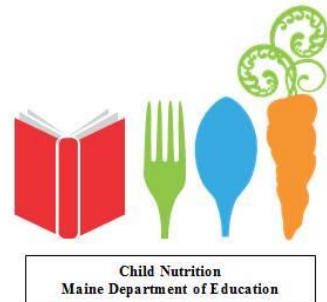
# Meal Counting and Claiming

- Type of System Used
- Back up system
- Training



# Breakfast in the Classroom (BIC)

- Train teachers
- Monitor the program to ensure requirements are being met
- Must offer two types of milk



# PS2: Meal Pattern & Nutritional Quality

Meal Components & Quantities

Offer vs. Serve

Dietary Specifications & Nutrient Analysis

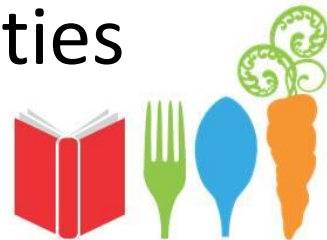




# PS2: Meal Pattern & Nutritional Quality

*SFAs agree to:*

- Offer students the required meal components in the required quantities
- Allow students to select required meal components on all reimbursable lines
- Record/claim only those meals that contain required components in required quantities



# PS2: Meal Pattern & Nutritional Quality

## Off-site

- Menu
- Production Records
- Component Crediting Documentation
- Recipes, labels, etc.
- Meal Compliance Tool
- Dietary Specifications Tool



## On-site

- Observe breakfast & lunch preparation
- Observe breakfast & lunch service
- Validate the off-site review



# Off-Site: Meal Components & Quantities

## Menu Documents: Breakfast & Lunch

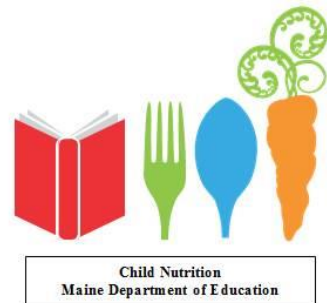
- Menu
- Menu Production Records
- Standardized Recipes – food component contribution, ingredients, serving size, yield
- Crediting Information
  - Nutrition Labels (ingredients and nutrition facts)
  - Child Nutrition (CN) Labels
  - Manufacturer's Product Formulation Statements

Review before submitting –  
can you determine how everything credits?



# Offer vs. Serve

- Menu must be posted with instructions on how to select a reimbursable meal – include requirement to select  $\frac{1}{2}$  cup f/v
- Staff must be able to recognize a meal
- Two full components and  $\frac{1}{2}$  cup fruit/vegetable for all age/grade groups

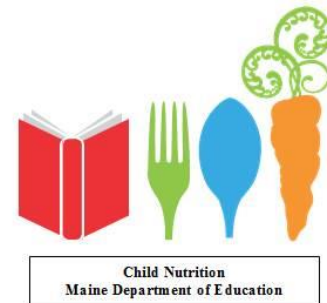


# Meal Components & Quantities

## Common Findings

- ✓ Insufficient quantities of a component offered
- ✓ Calculation errors when determining meal component contributions
- ✓ OvS not implemented correctly
- ✓ Missing meal components
- ✓ Incomplete production records
- ✓ Field Trips

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# Menu Errors

Missing meal components should not happen

- ✓ Double check menu as planned against the requirements
  - ✓ Daily/weekly minimums
- ✓ Know how to credit components
- ✓ Staff must accurately identify a reimbursable meal at the POS
- ✓ Plan a 2/2 every day!



# Resource Management

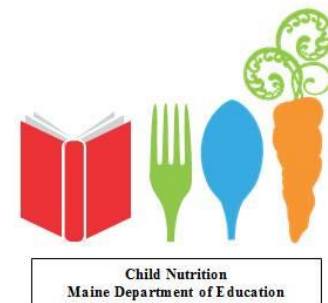
Maintenance of the non-profit school food  
service account

Paid Lunch Equity

Revenue from non-program foods

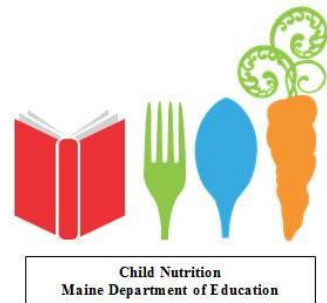
Indirect Costs

\*Procurement new SY 2016-17



# Common Findings

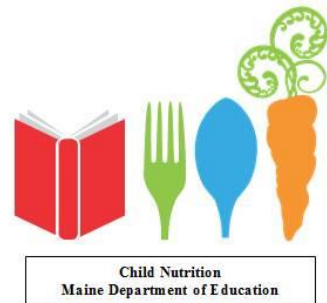
- A la carte should make a profit
- Not reporting costs accurately
- Not Following charging policy
- Cashbook balance does not match the accounting software in the district





# Adult Pricing

- Must be greater than per meal cost
- Only program adults may receive free meals – not the principal, not the security guard, not the lunch monitor...



# General Program Compliance

1. Civil Rights
2. Food Safety
3. Local Wellness Policy
4. Competitive Foods
5. Water
6. SFA On-site monitoring
7. Reporting and Recordkeeping
8. SBP/SFSP Outreach



# Civil Rights



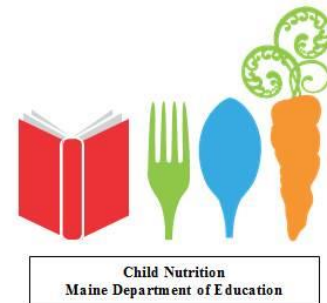
First item we look for  
and so should you...

- Posted where your customers can see it
- Translations available on FNS website



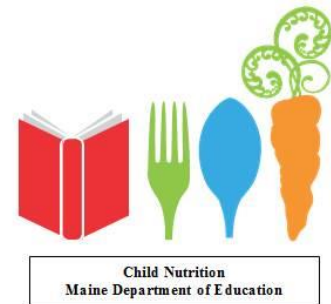
# Civil Rights

- “And Justice for All” poster
- Non-discrimination statement
- Procedures for receiving and processing civil rights complaints within FNS programs
- Documentation for annual civil rights training for staff
- Accommodating students with special dietary needs



# General Program Compliance

## Food Safety



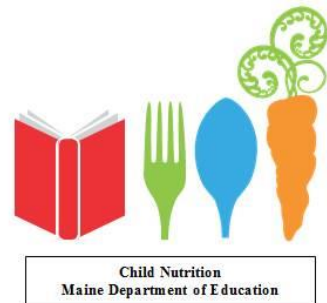
# On-Site Documentation

- Food Safety Plan
  - Should be customized for each site
  - Customizable sample from ICN (NFSMI)
- Recordkeeping: Temperature logs, calibration logs
- Certified Food Protection Manager (ServSafe)
- Ghost trays - are required by DOE
- Hair/beard restraints - WEAR THEM



# On-Site Documentation

- Health Inspections
  - Must post recent health inspection in visible location (post a copy, not the original)
  - Keep on file old health inspections



# On-Site Observations

## Kitchen & Storage areas

- Proper personal hygiene
- Cross contamination prevention
- Temperature monitoring
- Cleaning/sanitizing procedures
- Food stored 6 inches off the floor
- Proper chemical storage

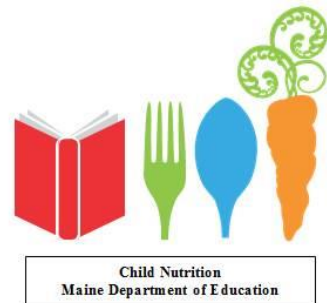




# Local Wellness Policy

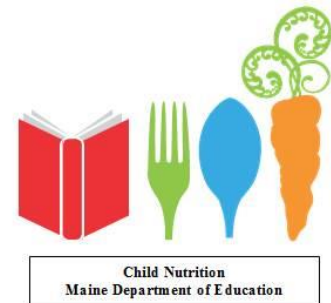
- Copy of LWP for review
- Has it been updated?
- Does it contain all of the required components?

\*Final rule for LWP released July 29, 2016



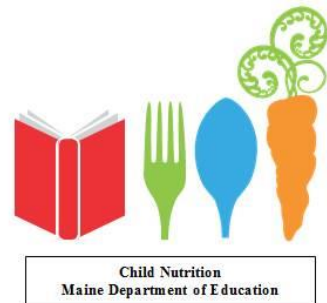
# Competitive Foods/Smart Snacks

- All foods & beverages sold to students during the school day
- Calories posted at point of decision
- Documentation that products are compliant
- Cafeteria/Vending Machines/School Stores



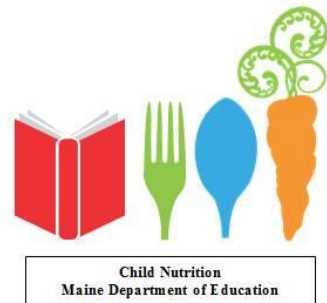
# Water

- Free, potable water must be available to students
  - Breakfast
  - Lunch



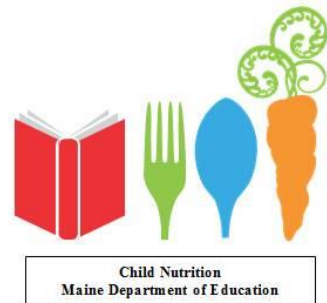
# SFA On-Site Monitoring

- For districts with 2 or more schools
- Lunch counting and claiming system must be monitored at each site prior to Feb 1<sup>st</sup>
- Implement any needed corrective action
- Sample form available on our website



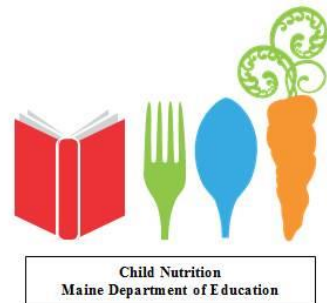
# Reporting and Record Keeping

Records must be kept for 7 years!  
(financial records, claims, production records...)



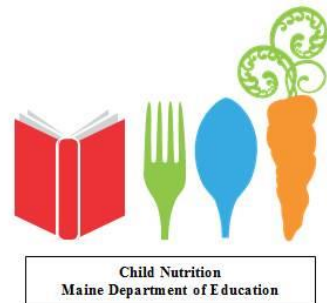
# Other Program Reviews

- School Breakfast Program
- Fresh Fruit & Vegetable Program
- Afterschool Snack Program
- Special Milk Program
- Seamless Summer



# School Breakfast Program

- At the beginning of each school year, notification to households that this program is available.
- Review of offsite paperwork
- Onsite observation



# Fresh Fruit and Vegetable Program

- Document - keep invoices
- Review the guidelines
  - FRESH not dried, not frozen, not popcorn...
  - Served during the school day, outside of meal times
  - Not provided to adults except for classroom teachers modeling behaviors
- Training
- Advertise/publicize
- Budgeting/claiming errors—video and tool available to help
- Food safety & sanitation in the classroom





# After School Snack Program

- Eligibility (if school is < 50% free/reduced)
- Accountability/Meal Counting and Claiming
- Menu & Meal Pattern Documentation
  - 2 components = 1 snack
  - Fruit/Veg is  $\frac{3}{4}$  cup serving
- Training Documentation for staff administering/counting and claiming
- Self-Review twice a year
  - First 4 weeks
  - Prior to end of school year
  - Document



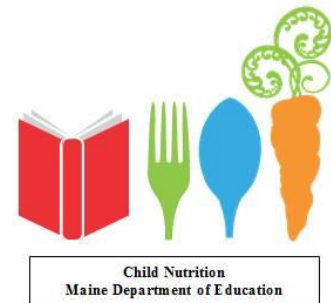
# Salad Bar After POS

- Requires a waiver from DOE if you are using these items to meet the meal pattern
- A new waiver is required EVERY year
- Student must have a reimbursable meal BEFORE POS
- Request must be detailed and emailed to Walter Beesley



# Post Review Activities

- Exit Conference with Superintendent
  - Review observations and findings
  - Corrective Action Plan
  - Potential Fiscal Action
- Administrative Review Report within 30-60 days
- Assess potential fiscal action (if needed)
- Corrective Action
  - To be submitted by deadline
  - Signed by Superintendent
  - Attach documentation if applicable

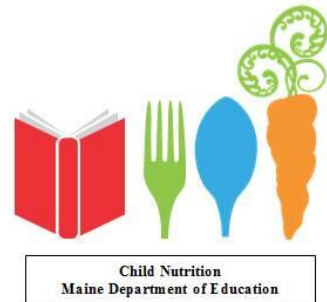


# Resources

**Admin Review Checklist**

**Upcoming Review Training:**  
September 15, 2016

**DOE Staff**



# Questions?

